

Marian Ann Brown
1383 S 1500 West
Springville, UT 84663
Pro Se Debtor

FILED IN THE
UNITED STATES
BANKRUPTCY COURT

2017 JUL 20 AM 10:32

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH
Central Division

DISTRICT OF UTAH
MAIL

In re: Bankruptcy Case No. 17-25166

Marian Ann Brown (a Chapter 7 case)

Debtor

OBJECTION TO MOTION OF FEDERAL MORTGAGE ASSOCIATION ("FANNIE MAE")
FOR TERMINATION OF THE AUTOMATIC STAY

COMES NOW Marian Ann Brown and files *pro se* an Objection to the Motion for Termination of the Automatic Stay filed by the Federal Mortgage Association ("Fannie Mae") and in support hereof now states:

1. That the Motion for Termination of the Automatic Stay should be denied because the Debtor's non-filing, co-debtor spouse, J. Roy Brown, died unexpectedly on June 17, 2017, three days after the Debtor filed the Chapter 7 bankruptcy petition *pro se*. The death may have significantly changed the Debtor's circumstances and legal position. A copy of the Death Certificate is attached here as **Exhibit A**.
2. In spite of this sudden, tragic event, the Debtor has made a diligent effort to comply with all of the bankruptcy filing requirements for this case so as not to unnecessarily delay the bankruptcy process. However, legal questions and concerns have surfaced relating to what is now the Estate of J. Roy Brown, specifically the Estate's position regarding the family home, which is described in Paragraph 3 of the Movant's Motion to Terminate the Automatic Stay and is the sole object of said motion.
3. The Debtor is no longer able to handle this case *pro se* and is in need of formal legal representation going forward. To accommodate this, the Debtor is requesting sufficient time to gather professional recommendations and funding to retain an attorney for legal representation.
4. The Debtor appeared at the scheduled Meeting of Creditors and respectfully requested at that meeting (and also in a written email to the Trustee sent before the meeting) that the meeting be continued for at least 30 days to allow time for legal representation to be retained, to facilitate a review of the documents already filed, and to prepare an action plan and supporting documents for, hopefully, moving forward to discharge.

5. WHEREFORE, the Debtor, Marian Ann Brown, prays that the Court deny the Motion for Termination of the Automatic Stay filed by the Federal Mortgage Association ("Fannie Mae") to allow enough time to determine the rightful and legal standing of all parties concerned in the outcome of this bankruptcy case, and to be properly applied specifically to the status of the family home.

Respectfully submitted,


Marian Ann Brown

CERTIFICATE OF SERVICE

I hereby certify that I mailed a copy of this Objection to the Motion for Termination of the Automatic Stay, by prepaid U.S. First Class Mail, to the following persons on July 18, 2017:

Philip G. Jones, Trustee
853 W Center Street
Orem, UT 84057

Mark S. Middlemas
Tom Cook
Lundberg & Associates, PC
3269 S. Main Street, Suite 100
Salt Lake City, UT 84115


Marian Ann Brown

Exhibit A

CERTIFICATE OF DEATH

State File Number: 2017008692

Joseph LeRoy Brown

DECEDENT INFORMATION

Date of Death: June 17, 2017
City of Death: Springville
Age: 75
Place of Birth: Alameda, California
Armed Services: No
Spouse's Name: Marian Ann May
Industry/Business: Insurance
Residence: Springville, Utah
Parent or Mother: Donna Evans Cole
Facility or Address: 1383 South 1500 West

Time of Death: 10:38
County of Death: Utah
Date of Birth: September 4, 1941
Sex: Male
Marital Status: Married
Usual Occupation: Insurance Broker
Education: Master's Degree
Parent or Father: Vern Melvin Brown
Facility Type: Home

INFORMANT INFORMATION

Name: Marian Ann Brown Relationship: Wife
Mailing Address: 1383 South 1500 West, Springville, Utah 84663

DISPOSITION INFORMATION

Method of Disposition: Burial
Place of Disposition: Salt Lake City Cemetery, Salt Lake City, Utah
Date of Disposition: June 22, 2017

FUNERAL HOME INFORMATION

Funeral Home: Utah Valley Mortuary
Address: 1966 West 700 North, Lindon, Utah 84042
Funeral Director: Steven J Furner

MEDICAL CERTIFICATION

Medical Professional: Richard E Allen MD, St Marks Hospital, 1250 East 3900 South Suite 260, Salt Lake City, Utah 84124

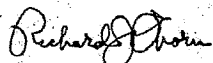
CAUSE OF DEATH

Multi System Organ Failure
Due to (or as a consequence of): Prostate Cancer
Tobacco Use: Unknown if User
Medical Examiner Contacted: No Autopsy Performed: No Manner of Death: Natural

Date Registered: June 19, 2017

Date Issued: June 19, 2017

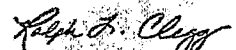
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Richard J. Oborn, MPA
State Registrar
Rev. 1/15



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Ralph Clegg, EHS, MPA
Executive Director
Utah County Health
Department



Utah County
HEALTH DEPARTMENT